

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

J.G., <i>et al.</i> Plaintiffs, vs. JONES, <i>et al.</i> Defendants.	Case No. 1:17-cv-01171 Judge Donald C. Nugent Magistrate Judge David A. Ruiz
JOINT MOTION FOR STAY OF CASE AND CONTINUANCE OF CASE MANAGEMENT CONFERENCE	

The parties have agreed to mediate their dispute with Michael N. Ungar. Accordingly—to avoid potentially unnecessary expenditures of party and Court resources—all parties jointly ask the Court to continue the case-management conference currently scheduled for August 3, 2017, and for a general stay of proceedings (including Defendants’ answer date), to afford the parties the opportunity to pursue a negotiated resolution. If the parties are unable to resolve the

case through mediation, the parties (or any one of them) will notify the Court and request that the Court resume the customary litigation schedule. The parties will notify the Court of the mediation's status by September 29, 2017.

To facilitate the parties' pre-mediation exchange of records, the parties are contemporaneously filing a joint request for the Court to enter a stipulated protective order to govern confidential information in the case.

Date: July 31, 2017

Respectfully submitted,

THE CHANDRA LAW FIRM LLC

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/s/ Marvin C. Brown IV

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CERTIFICATE OF SERVICE

The foregoing document was served on all parties by operation of the Court's e-filing system on July 31, 2017:

/s/ Marvin C. Brown IV

One of the Attorneys for the Plaintiffs